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*and Best Sunshine International (BVI) Ltd.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

Imperial Pacific International (CNMI) LLC,  
Best Sunshine International (BVI) Ltd.;

Plaintiffs,

Vs.

Commonwealth of the Northern Mariana  
Islands, Commonwealth Casino  
Commission, Edward C. Deleon Guerrero,  
Chairman of CCC, in his official and  
personal capacities; Rafael S. Demapan,  
Vice Chairman of CCC, in his official and  
personal capacities; Mariano Taitano,  
Commissioner of CCC, in his official and  
personal capacities; and Does 1-5, all  
inclusive;

Defendants.

Case No. 1:24-cv-00002

**DECLARATION OF MICHAEL  
CHEN**

I, Michael Chen, declare as follows:

1. I am above the age of 18 and am competent to testify as to the matters stated herein.

- 1 2. I am attorney of record (pro hac vice) for plaintiff in the above captioned matter.
- 2 3. As shown by proofs of service attached to this Declaration as **Exhibit 1**, Defendants
- 3 Edward C. Deleon Guerrero, Chairman of CCC, in his official and personal
- 4 capacities; Rafael S. Demapan, Vice Chairman of CCC, in his official and personal
- 5 capacities; Mariano Taitano, Commissioner of CCC, in his official and personal
- 6 capacities were served with the First Amended Complaint in this matter on May 9,
- 7 2024.
- 8 4. The First Amended Complaint were served upon the attorney of record for the three
- 9 defendants. Mr. Carl Allen Flores Dela Cruz, through the ECF System, See **Exhibit**
- 10 **1**.
- 11 5. More than 21 days have passed since these three defendants were served with the
- 12 First Amended Complaint, and neither of them have served a responsive pleading or
- 13 filed a motion within the time provided by Rule 12(a) of the Federal Rules of Civil
- 14 Procedure.

15 I declare under the penalty of perjury that the foregoing is true and correct. Executed

16 on June 6, 2024, in Fruitland, Utah.

17 Michael Chen  
18 By: /s/ Michael Chen  
19 Michael Chen Law Offices  
20 7330 Edna Ave.  
21 Las Vegas, NV 89117  
22 *Pro Hac Vice*

23 Attorneys for Plaintiffs  
24 IMPERIAL PACIFIC INTERNATIONAL  
25 (CNMI), LLC, Best Sunshine International  
26 (BVI) Ltd.  
27  
28

# EXHIBIT

# 1

Thursday, June 6, 2024 at 17:33:03 Mountain Daylight Time

**Subject:** Activity in Case 1:24-cv-00002 Imperial Pacific International (CNMI) LLC v. Commonwealth of the Northern Mariana Islands et al

**Date:** Wednesday, May 8, 2024 at 12:00:37 PM Mountain Daylight Time

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**U.S. District Court**

**Northern Mariana Islands**

**Notice of Electronic Filing**

The following transaction was entered by Chen, Michael on 5/9/2024 at 3:59 AM GMT+10 and filed on 5/9/2024

**Case Name:** Imperial Pacific International (CNMI) LLC v. Commonwealth of the Northern Mariana Islands et al

**Case Number:** [1:24-cv-00002](#)

**Filer:** Imperial Pacific International (CNMI) LLC

**Document Number:** [26](#)

**Docket Text:**

**First AMENDED COMPLAINT against Commonwealth of the Northern Mariana Islands, Edward C Deleon Guerrero, Rafael S Demapan, Mariano Taitano, Commonwealth Casino Commission with Jury Demand, filed by Imperial Pacific International (CNMI) LLC. (Attachments: # (1) Exhibit, # (2) Exhibit, # (3) Exhibit) (Chen, Michael)**

**1:24-cv-00002 Notice has been electronically mailed to:**

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**Document description:**Main Document

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